



February 24, 2009  
*Via ECFS Transmission*

2600 Maitland Center Pkwy.  
Suite 300  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL  
32790-0200  
Tel: 407-740-8575  
Fax: 407-740-0613  
www.tminc.com

Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW – Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36**  
**2008 CPNI Certification Filing for Dollar Phone Enterprise, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Dollar Phone Enterprise, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas  
Consultant to Dollar Phone Enterprise, Inc.

*ST/im.*

*Enclosure*

Copy: Enforcement Bureau (*2 Copies*)  
Best Copy and Printing (*FCC@BCPIWEB.COM*)  
Eitan Kimmelman, Dollar Phone Enterprise, Inc.  
TMS: FCX0901  
File: Dollar Phone Enterprise, Inc. – FCC CPNI

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: **Dollar Phone Enterprise, Inc.**

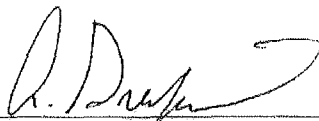
Form 499 Filer ID: **827115**

Name of signatory: Abraham Greenfield

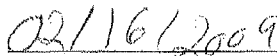
Title of signatory: President

I, Abraham Greenfield, certify and state that:

1. I am the President of Dollar Phone Enterprise, Inc. ("DPE") and, acting as an agent of the company, I have personal knowledge of DPE's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, DPE's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



Abraham Greenfield, President



Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## **Dollar Phone Enterprise, Inc.**

### **Statement of CPNI Procedures and Compliance**

Dollar Phone Enterprise, Inc. ("DPE" or "the Company") operates solely as a prepaid calling card provider which furnishes Personal Identification Numbers ("PINs") to distributors, who in turn sell the prepaid calling cards to end users. As such, DPE provides casual calling services to transient users with whom it does not have a subscriber relationship. Therefore, it does not have any information that relates to the quantity, technical configuration, type, or location of the customer's service and does not even know the customers' billing name and address. Because the service is provided outside of any subscribed service relationship, the Company does not obtain any CPNI that can be used for marketing purposes.

DPE does have call detail information concerning the calls made using the Company's prepaid calling cards. However, this information is not made available to customers over the telephone, online, or in person.

Should DPE expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U.

The Company has processes in place to safeguard the call detail information that it obtains through the use of its prepaid calling cards from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records.

To the extent the Company provides services in the future that involves CPNI or call detail records, the Company will ensure that it establishes procedures to notify law enforcement in the event of a breach of such CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company would institute a process to record all breaches discovered and to provide notification to the United States Secret Service, FBI and customers, to the extent possible.

DPE did not have any breaches during 2008.

DPE has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2008.

Due of the nature of its business, DPE does not believe that pretexters would attempt to gain access to the call detail records that it obtains from the provision of prepaid calling card service, because the call details are not tied to presubscribed customers.

Accordingly, the Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.